



July 31, 2007

Reply to the Attn: Office of Chief Counsel

MEMORANDUM FOR RECORD

FROM: Kenneth Human

SUBJECT: Approval for SSC Employees with Senior Institutional or Project Responsibilities to Attend a Pre-launch Reception Sponsored by Mississippi Space Services.

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Stennis Space Center ("SSC") employees with senior institutional or project responsibilities with regard to SSC's operating services have been invited to attend a pre-launch reception sponsored by Mississippi Space Services ("MSS") at the Doubletree Hotel, Cocoa Beach, Florida, on or about Monday, August 6, 2007, from 7 p.m. to 9 p.m. This event is to be held in conjunction with the launch of STS-118, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, NASA employees, and members of the public. The reception is valued at approximately \$12 per person and approximately 55 individuals have been invited to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

MSS is a NASA contractor that is currently involved in operating services at SSC. Some SSC personnel invited to attend this event presently have extensive involvement in matters relating to MSS' business interests. The invited personnel include the following: SSC Center Director; SSC Deputy Director; SSC Manager of Safety and Mission Assurance; SSC Manager of External Affairs and Education; and, SSC Public Affairs Officer. These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence the current MSS contract.

I have determined that free attendance of these senior institutional and project leaders at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information concerning its activities.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these



senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, SSC employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

Questions about this determination may be addressed to Marleen J. Phillips at 228-688-1587.

*Original signed by Marleen J. Phillips, for*

Kenneth Human  
Chief Counsel